

1 David S. Casey, Jr., SBN 060768

2 *dcasey@cglaw.com*

3 Gayle M. Blatt, SBN 122048

4 *gmb@cglaw.com*

5 P. Camille Guerra, SBN 326546

6 *camille@cglaw.com*

7 **CASEY GERRY SCHENK FRANCAVILLA  
BLATT & PENFIELD, LLP**

8 110 Laurel Street

9 San Diego, CA 92101

10 Telephone: (619) 238-1811

11 Facsimile: (619) 544-9232

12 M. Anderson Berry, SBN 262879

13 *aberry@justice4you.com*

14 Gregory Haroutunian, SBN 330263

15 *gharoutunian@justice4you.com*

16 Michelle Zhu, SBN 347741

17 *mzhu@justice4you.com*

18 **CLAYEO C. ARNOLD,**

19 **A PROFESSIONAL CORP.**

20 865 Howe Avenue

21 Sacramento, CA 95825

22 Tel.: 916.239.4778

23 Fax: 916.924.1829

24 *Proposed Interim Class Counsel*

25 [Additional counsel appear on signature page]

26 UNITED STATES DISTRICT COURT

27 NORTHERN DISTRICT OF CALIFORNIA

28 SAN FRANCISCO DIVISION

29 IN RE: 23ANDME, INC., CUSTOMER  
30 DATA SECURITY BREACH LITIGATION

31 This Document relates to ALL ACTIONS

32 Case No.: 3:24-md-03098-EMC

33 MDL No. 3098

34 Hon. Edward M. Chen

35 **SUGGESTIONS IN SUPPORT OF SPECIAL  
36 SETTLEMENT MASTER**

Pursuant to the Court's Pretrial Order No. 1 (ECF 11), Plaintiffs Monica Santana, Paula Kleynburd, Bonnie Eden, Daniel Pinho, Thomas Seawright, Pamela Zager-Maya, Adriane Farmer, Harold Velez, and Brianna Sorenson suggest that the Court might proceed in any of the following ways:

1. Randall Wulff, Esq<sup>1</sup>. has been actively involved in the mediation efforts to date. We recommend the Court permit Mr. Wulff to continue his efforts in the near term.
2. If a proposed resolution is not reached within sixty to ninety days through Mr. Wulff's efforts, we recommend the Court consider appointing Chief Magistrate Judge Donna M. Ryu or Magistrate Judge Laurel Beeler (who both have familiarity with this matter) as Special Settlement Master. The Court is well aware of their qualifications, and they are well versed in the Northern District of California's expectations and requirements as they relate to class action settlements presented for approval.
3. As a further alternative, we suggest that the Hon. Diane M. Welsh (Ret.)<sup>2</sup> of JAMS would be an excellent Special Settlement Master for this particular case. Judge Welsh has substantial experience in mediating privacy and data breach cases, as well as other large and complex matters. Her success as a mediator has earned her the respect of the parties who come before her in substantial and often contentious litigation cases.

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<sup>1</sup> <https://www.wqsadr.com/about/randall-wulff/>

<sup>2</sup> <https://www.jamsadr.com/welsh/?tab=bio>

1 Dated: May 20, 2024

Respectfully submitted,

2 By: /s/ Gayle M. Blatt  
3 Gayle M. Blatt  
gmb@cglaw.com  
4 David S. Casey, Jr  
dcasey@cglaw.com  
P. Camille Guerra  
camille@cglaw.com  
5 **CASEY GERRY SCHENK FRANCAVILLA**  
6 **BLATT & PENFIELD, LLP**  
7 110 Laurel Street  
San Diego, CA 92101  
Telephone: (619) 238-1811  
8 Facsimile: (619) 544-9232

9 /s/ M. Anderson Berry  
M. Anderson Berry, SBN 262879  
10 Gregory Haroutunian, SBN 330263  
Brandon P. Jack, SBN 325584  
11 Michelle Zhu, SBN 347741  
12 **CLAYEO C. ARNOLD,**  
**A PROFESSIONAL CORP.**  
865 Howe Avenue  
Sacramento, CA 95825  
Tel.: 916.239.4778  
Fax: 916.924.1829  
aberry@justice4you.com  
gharoutunian@justice4you.com  
bjack@justice4you.com  
mzhu@justice4you.com

17 Maureen Kane Berg (*Pro Hac Vice*)  
18 **LOCKRIDGE GRINDAL NAUEN P.L.L.P.**  
100 Washington Avenue South, Suite 2200  
Minneapolis, MN 55401  
19 Tel.: 612.339.6900; Fax: 612.339.0981  
mkberg@locklaw.com

21 Melissa R. Emert (*Pro Hac Vice*)  
22 **Kantrowitz, Goldhamer & Graifman, P.C.**  
135 Chestnut Ridge Road, Suite 200  
Montvale, NJ 07645  
23 Tel.: 845.356.2570; Fax: 845.356.4335  
memert@kgglaw.com

24 Attorneys for Plaintiffs Santana, Kleynburd, Eden, Pinho,  
25 Seawright, Zager-Maya, Sorensen, Farmer, and Velez and  
the Proposed Class